

**RESPONSES TO DOI-OEPC COMMENTS  
ON THE NATURAL RESOURCE IMPACT ASSESSMENT  
AND NATURAL RESOURCE RESTORATION PLAN,  
JULY 1998 DRAFT FINAL**

**GENERAL COMMENTS**

- 1) **Comment:** Each section of the document that discussed "past impacts" from contaminants of concern (COCs) should have referenced the source or suspected source of those COCs, and those sections that discussed future impacts and/or residual impacts should have mentioned how remedial actions will reduce concentrations of those COCs.
- Response:** All COCs identified through the Remedial Investigation/Feasibility Study (RI/FS) processes were assumed to be a result of production activities. The Natural Resource Impact Assessment (NRIA) does not qualify the findings of the RI/FS processes, but rather summarizes and organizes the existing data in a useful format for the Natural Resource Trustees (NRTs). This process is described in Sections 1.1 and 1.2 of the NRIA. A more detailed discussion of ecological COCs can be found in Appendix C of the Sitewide Excavation Plan (SEP). A summary of this report is provided in Addendum A of the Natural Resource Restoration Plan (NRRP).
- Action:** None required.

**SPECIFIC COMMENTS**

- 2) **Comment:** In Table 2-4, please include in the footnotes the formula for each of the metrics listed in the table.
- Response:** Agree.
- Action:** Revise Table 2-4 accordingly (see attached page inserts for specific language).
- 3) **Comment:** In Table 2-5, please include in the footnotes definitions of insectivorous and foliage gleaning.
- Response:** Agree.
- Action:** Revise Table 2-5 accordingly (see attached page inserts for specific language).
- 4) **Comment:** One of the items that you may wish to address when planting instructions are written (as referenced in Section 3.2.1 on page 3-6) is mycorrhizal fungi inoculation of the roots of trees to be planted. We understand that this speeds growth and improves health/survival of trees planted on mine reclamation sites. This technique might be useful at Fernald, especially in areas where topsoil is not present.
- Response:** Agree.
- Action:** Mycorrhizal fungi inoculation will be considered in individual Natural Resource Restoration Design Plans (NRRDPs).

- 5) Comment: There needs to be criteria for successful establishment of restoration vegetation included either in the NRRP or the specific restoration plans. These criteria should be agreed upon by the trustees as a condition for settlement of the NRDA claim. These criteria should contain monitoring instructions and specify the acceptable survival percentage after given periods of time, and corrective actions that will be taken if the criteria are not met.

Response: Agree. Specific monitoring requirements will be developed in conjunction with all FEMP NRTs for each specific restoration project. These requirements will be specified in individual NRRDPs.

Action: None required.

- 6) Comment: Section 5.0, "Monitoring," is critical to the success of natural resource restoration, and the monitoring methods and standards will require agreement by the trustees as a condition for settlement of the NRDA claim. Monitoring, as well as the completion criteria mentioned in number 5 above, should be part of the NRRP, or more likely, the specific restoration plans. We were curious about the genesis of the statement in this section that "Quantitative measurements may not be necessary to measure changes over time." Not only is the origin of the statement unclear but seems inaccurate. We think it likely that quantitative measurements will be necessary.

Response: Agree. See response to Comment No. 5. Some aspects of monitoring may only require visual observation rather than quantification. Specific requirements will be developed in conjunction with the NRTs for each NRRDP.

Action: None required.

- 7) Comment: In Section 7, "Institutional Controls and Future Land Use," on page 7-1 it is claimed that there will be continued federal ownership of the FEMP. However, on page 7-2 federal ownership appears to be restricted to the disposal facility, an undefined associated buffer, and ownership "... to the extent necessary to ensure the continued protection of human health commensurate with the clean-up levels established by the remedy." This section of the NRRP does not specifically address the need for lands restored under the NRDA settlement agreement to remain in federal (DOE) ownership. If the NRRP is expected to play a role in the NRDA settlement, the retention of restored lands by the DOE, the expected acreage, and a commitment to continued management, should be clearly stated in Section 7.

The costs incurred by the Department of the Interior for past assessment of natural resources damages, as well as future costs incurred for evaluation and oversight of restorations, should be reimbursed by lump sum payments based on itemized statements of costs. Details of these reimbursements will be part of the settlement negotiation process, but not necessarily part of the NRRP.

Response: The entire FEMP property will remain in federal ownership once remediation and restoration activities have been completed. The text will be revised to reflect this statement. Expected restoration acreages are provided in Table 4-1. Specific monitoring and management commitments will be spelled out in individual NRRDPs,

as well as a separate settlement document. The settlement document will also stipulate payment agreements between DOE and the other trustees, if any are agreed to.

Action: Revise Section 7 accordingly (see attached page inserts for specific language).